

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GLOUCESTER, CUMBERLAND, SALEM
SCHOOL DISTRICTS JOINT INSURANCE
FUND, GATEWAY REGIONAL BOARD OF
EDUCATION, and SCHOOL POOL FOR
EXCESS LIABILITY LIMITS JOINT
INSURANCE FUND,

Plaintiffs,

v.

SELECTIVE INSURANCE COMPANY OF
AMERICA, and ILLINOIS UNION
INSURANCE COMPANY,

Defendants.

CIVIL ACTION NO.: 11-CV-6005

District Judge Joseph E. Irenas
Magistrate Judge Joel Schneider

**AFFIDAVIT/CERTIFICATION
IN SUPPORT OF DISCOVERY
CONFIDENTIALITY ORDER**

DOCUMENT
ELECTRONICALLY FILED

Jessika J. Moon, pursuant to Local Rule 5.3, submits the following in support of the parties' joint proposed Discovery Confidentiality Order, and declares under the penalty of perjury that the following is true:

1. I am a partner in the law firm Sedgwick LLP, attorneys for defendant Illinois Union Insurance Company ("Illinois Union") in the above-captioned matter and have been admitted, *pro hac vice*, in this matter. As such, I am fully familiar with the facts and circumstances of this matter.

2. I submit this Affidavit/Certification in support of the jointly agreed-to proposed Discovery Confidentiality Order filed in this action.

3. Illinois Union contends that the documents it may produce in this action include documents generated in connection with its insurance business and contain commercially sensitive, proprietary and/or otherwise confidential information, and/or documents that Illinois Union believes in good faith may be entitled to protection under Rule 26(c)(1)(G) of the Federal Rules of Civil Procedure and Local Civil Rule 5.3, the disclosure of which could damage its business operations.

4. The undersigned and counsel for Plaintiffs have agreed to the form of the Confidentiality Order electronically filed in this action.

5. Accordingly, Illinois Union respectfully requests that the Court “so order” the proposed Confidentiality Order.



JESSIKA J. MOON

Dated: New York, New York
April 30, 2012